## UNITED STATES DISTRICT COURT FOR THE DISTRICT OF MARYLAND

In Re Sub	poena to:
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POLARIS RECOVERY CENTER, LLC d/b/a MARYLAND ADDICTION RECOVERY CENTER.

Served in *RJ*, et al. v. Cigna Health and Life Insurance Company, et al., Case No. 5:20-cv-2255-EJD (N.D. Cal.)

## CIGNA HEALTH AND LIFE INSURANCE COMPANY'S MOTION TO COMPEL RESPONSES TO NON-PARTY SUBPOENA

Pursuant to Rules 45(d)(2)(B)(i) and 45(g) of the Federal Rules of Civil Procedure, Cigna Health and Life Insurance Company ("Cigna") respectfully moves to compel compliance with the subpoena ("Subpoena") issued to Polaris Recovery Center, LLC d/b/a Maryland Addiction Recovery Center ("MARC") in connection with *RJ*, et al. v. Cigna Health and Life Insurance Co., et al., Case No. 5:20-cv-02255-EJD (N.D. Cal.) ("RJ"), a lawsuit pending in the United States District Court for the Northern District of California. For reasons stated in the concurrently-filed Memorandum of Law, the Court should grant the Motion and compel MARC to comply with the Subpoena.

Dated: June 24, 2022 Respectfully submitted,

By: /s/ Michael B. Kimberly

Michael B. Kimberly

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Attorneys for Defendant Cigna Health and Life Insurance Company

## **CERTIFICATE OF SERVICE**

I hereby certify that on June 24, 2022, I submitted the foregoing for filing by submitting a paper copy to the Clerk's Office via personal service. A true and correct copy of this motion will be served via email to Counsel for MARC:

G. Harrison Bliss, II Davis, Agnor, Rapaport & Skalny, LLC 10211 Wincopin Circle, Suite 600 Columbia, Maryland 21044 hbliss@darslaw.com

A true and correct copy of the foregoing will also be served on RJ Plaintiffs via email to:

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/s/ Michael B. Kimberly

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